

WEINER | LESNIAK LLP

CLARK E. ALPERT
Member of the Firm

ATTORNEYS AT LAW
www.weinerlesniak.com

calpert@weinerlesniak.com
Direct Dial: 973-352-8620

June 10, 2015

VIA ELECTRONIC FILING

Hon. Kevin McNulty, U.S.D.J.
United States District Court for
the District of New Jersey
Frank R. Lautenberg U.S.P.O. &
Courthouse
Federal Square
Newark, New Jersey 07102

Re: P. Van Hove BVBA, et als. v. Universal Travel Group, Inc., et als.
Case No.: 2:11-cv-2164 (KM-SCM)
Pending Motion to Amend Complaint and Cross-Motion to
Intervene

Dear Judge McNulty:

We represent defendant, Acquavella, Chiarelli, Shuster & Co., LLP, and proposed Intervenors, Acquavella, Chiarelli, Shuster, Berkower & Co., LLP, Joseph P. Acquavella, Santo Chiarelli, Samuel Shuster and Maurice Berkower. We are in receipt of plaintiffs' Reply Memorandum filed on June 8, 2015 (though through an anomaly not delivered to me electronically until last night). The motion is returnable on June 15, 2015. We respectfully request oral argument, for these reasons:

1. This is a substantial matter involving complex issues and a very large claim.
2. There are material inaccuracies in the Reply Memorandum that should be pointed out to the Court, including representations to the Court on key matters.
3. Plaintiffs' motion was 'bare bones' and contained none of the materials to which we would be sur-replying.

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In light of the foregoing, if oral argument is denied, we would respectfully request leave to file a sur-reply not exceeding three pages.

I thank the Court for its courtesies.

Respectfully submitted,

WEINER LESNIAK, LLP

By: 

Clark E. Alpert

A Member of the Firm

CEA:eac

cc via electronic filing:
All Counsel